

DOCKET FILE COPY ORIGINAL
Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:)

DISMISSAL OF ALL PENDING)
PIONEER'S PREFERENCE)
REQUESTS)

CC Docket No. 92-297
ET Docket No. 94-124
GEN Docket No. 90-314
GEN Docket No. 90-357
IB Docket No. 97-75

REVIEW OF THE PIONEER'S)
PREFERENCE RULES)

ET Docket No. 93-266

To: The Commission

COMMENTS IN SUPPORT OF
PETITION FOR RECONSIDERATION
OF QUALCOMM INCORPORATED

Global Broadcasting Company, Inc. ("Global"), by its attorneys, herewith supports the "Petition for Reconsideration of Qualcomm Incorporated" ("Petition"). In support, the following is shown.

1. On June 24, 1996, Gregory D. Deieso, tendered a "Petition for Rulemaking" requesting that the FCC initiate a rulemaking proceeding to establish Event Broadcast Stations, a service which Mr. Deieso had pioneered.¹ On July 15, 1996, Mr.

¹ The Petition was initially filed in the name of Web SportsNet, Inc. However, it was supplemented and revised on September 27, 1996, to reflect that the Petitioner is Gregory D. Deieso.

Deieso tendered a "Request for Pioneer's Preference" for his work in creating Event Broadcasting.

2. Mr. Deieso has assigned all of his interests in this matter to Global, in which he is a principal and a 50% shareholder. Thus, Global is the successor to Mr. Deieso with regard to the request for a Pioneer's Preference.

3. Global enthusiastically supports, the Qualcomm Incorporated Petition. Qualcomm has persuasively demonstrated why the Commission's action dismissing all pending requests for Pioneer's Preferences, including that of Mr. Deieso, was not justified.

4. Accordingly, Global joins with Qualcomm in requesting that the Commission reverse its action. Moreover, Global requests that the Commission consider on the merits that Mr. Deieso's July 15, 1996, "Request for Pioneer's Preference" as supplemented September 27, 1996.

Respectfully Submitted,

GLOBAL BROADCASTING COMPANY, INC.

By Harold K. McCombs Jr.
Harold K. McCombs, Jr.

Its Attorney

November 12, 1997

DUNCAN, WEINBERG, MILLER & PEMBROKE, PC
Suite 800
1615 M Street, NW
Washington, DC 20036
202-467-6370
FAX: 467-6379
e-mail: hkm@dwmpdc.com

CERTIFICATE OF SERVICE

I, Harold K. McCombs, do hereby certify that I have caused to be served by mail, First Class postage prepaid, this 12th day of November, 1997, copies of the foregoing "Comments in Support of Petition for Reconsideration of Qualcomm Incorporated" upon the following persons:

Veronica M. Ahern, Esquire
Nixon, Hargrave, Devans & Doyle L.L.P.
Suite 700
One Thomas Circle, N.W.
Washington, D.C. 20005-5802

Andre J. Lachance, Esquire
GTE Mobilenet
Suite 1200
1850 M Street, N.W.
Washington, D.C. 20036-5801

Harold Mordkofsky, Esquire
Robert M. Jackson, Esquire
Blooston, Mordkofsky, Jackson & Dickens
Suite 300
2120 L Street, N.W.
Washington, D.C. 20037

Robert B. Kelly, Esquire
Kelly & Povich, P.C.
Suite 300
1101 30th Street, N.W.
Washington, D.C. 20007-3708

George H. Shapiro, Esquire
Arent, Fox, Kintner, Plotkin & Kahn
Suite 600
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5339

Gene A. Bechtel, Esquire
Bechtel & Cole, Chartered
Suite 250
1901 L Street, N.W.
Washington, D.C. 20036

Jonathan M. Chambers, Esquire
Sprint Spectrum, L.P.
Suite M112
1801 K Street, N.W.
Washington, D.C. 20006

Louisa L. Laucetti, Esquire
Wilkinson, Barker, Knauer & Quinn
Suite 600
1735 New York Avenue
Washington, D.C. 20006-5289

E. Edward Bruce, Esquire
Kurt A. Wimmer, Esquire
Covington & Burling
P.O. Box 7566
Washington, D.C. 20044-7566

Werner K. Hartenberger, Esquire
Dow, Lohnes & Albertson, P.L.L.C.
Suite 800
1200 New Hampshire Avenue, N.W.
Washington, D.C. 20036-6802

Mark J. Tauber, Esquire
Piper & Marbury, L.L.P.
Suite 700
1200 19th Street, N.W.
Washington, D.C. 20036-2430

Robert B. McKenna, Jr. Esquire
U.S. West, Inc.
Suite 5100
1801 California Street
Denver, CO 80202

ITS, Inc.
1231 20th Street, N.W.
Washington, D.C. 20036

Tara Kalagher Giunta, Esquire
Coudert Brothers
12th Floor
1627 I Street, N.W.
Washington, D.C. 20006

Michael R. Gardner, Esquire
Law Offices of Michael R. Gardner
Suite 710
1150 Connecticut Avenue, N.W.
Washington, D.C. 20036

Victor J. Toth, Esquire
Law Offices of Victor J. Toth
2719 Soapstone Drive
Reston, VA 22091

George Petrutsas, Esquire
Fletcher, Heald & Hildreth, P.L.C.
11th Floor
1300 North 17th Street
Arlington, VA 22209

Robert G. Allen, Esquire
Allen & Harold, P.L.C.
10610-A Crestwood Drive
Manassas, VA 22110

Brent H. Weingardt, Esquire
Steptoe & Johnson, L.L.P.
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036-1795

Robert J. Miller, Esquire
Gardere & Wynne
Suite 3000
1601 Elm Street
Dallas, TX 75201

Mr. Joel Efrein, President
Radio Tour/USA
Slippery Slide Falls
P.O. Box 199
Kilauea, HI 96754

Jonathan D. Blake, Esquire
Covington & Burling
P.O. Box 7566
Washington, D.C. 20044-7566

Mark A. Grannis, Esquire
Gibson, Dunn & Crutcher, L.L.P.
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5306

Harold K. McCombs Jr.

Harold K. McCombs, Jr.